

Fill in this information to identify the case:

3

Debtor 1	<u>Matthew U. Ryan</u>
Debtor 2 (Spouse, if filing)	
United States Bankruptcy Court for the: <u>WESTERN</u>	District of: <u>PA</u> (State)
Case number	<u>16-10682-TPA</u>

Form 4100R**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Citibank, N.A., as Trustee, in trust for registered Holders of WaMu Asset-Backed Certificates WaMu Series 2007-HE4 Trust c/o Select Portfolio Servicing, Inc.

Court claim no. (if known):
3

Last 4 digits of any number you use to identify the debtor's account: 3 7 9 7

Property address: 1028 E. 34th Street
Number Street

Erie PA 16504
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 1/1/2020

MM / DD / YYYY

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ _____

c. **Total.** Add lines a and b.

(c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 **Matthew U. Ryan**
First Name Middle Name Last Name

Case number (if known) **16-10682-TPA**

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- I am the creditor.
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Danielle Boyle-Ebersole, Esquire Date 1/30/2020
Signature

Print Danielle Boyle-Ebersole, Esquire Title Attorney
First Name Middle Name Last Name

Company Hladik, Onorato & Federman, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 298 Wissahickon Avenue
Number Street
North Wales, PA 19454
City State ZIP Code

Contact phone (215) 855- 9521 Email debersole@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 16-10682-TPA
Matthew U. Ryan	:	Chapter 13
Debtor	:	
Citibank, N.A., as Trustee, in trust for	:	
registered Holders of WaMu Asset-Backed	:	
Certificates WaMu Series 2007-HE4 Trust c/o	:	
Select Portfolio Servicing, Inc.	:	
Movant	:	
vs.	:	
Matthew U. Ryan	:	
Debtor/Respondent	:	
and	:	
Ronda J. Winnecur, Esquire	:	
Trustee/Respondent	:	

CERTIFICATE OF SERVICE

I, Danielle Boyle-Ebersole, Esq., hereby certify that I caused to be served true and correct copies of the **STATEMENT IN RESPONSE TO NOTICE OF FINAL CURE PAYMENT** at the respective last known address of each person set forth below on January 30, 2020:

Tina M. Fryling, Esquire
Via ECF:
tinafryling@gmail.com
Attorney for Debtor

Matthew U. Ryan
1028 E. 34th Street
Erie, PA 16504
Via First Class Mail
Debtor

Ronda J. Winnecur, Esquire
Via ECF:
cmevf@chapter13trusteewdpa.com
Trustee

Date: 1/30/2020

Respectfully Submitted,
/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
298 Wissahickon Avenue
North Wales, PA 19454
Phone 215-855-9521
Fax 215-855-9121